

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
ARNOLD WILLIAMS	:	VIOLATIONS: 21 U.S.C. § 846
MUSTAFA FRISBY	:	(Conspiracy to possess cocaine
	:	base with intent to
	:	distribute - 1 count)
	:	21 U.S.C. § 841(a)(1)
	:	(Possession of cocaine
	:	base with intent to
	:	distribute - 1 count)
	:	18 U.S.C. § 924(c)(1)
	:	(Carrying a firearm
	:	in relation to a
	:	drug trafficking
	:	crime - 1 count)
	:	18 U.S.C. § 922(g)(1)
	:	(Felon in possession
	:	- 1 count)
	:	Notice of Prior Conviction

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about March 9, 2002, at Philadelphia, in the Eastern District of
Pennsylvania, defendants

ARNOLD WILLIAMS and
MUSTAFA FRISBY

did conspire and agree, together and with persons known and unknown to the grand jury, to

knowingly and intentionally possess with intent to distribute in excess of 50 grams, that is, approximately 130 grams, of a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A).

Manner and Means

1. It was part of the conspiracy that the defendants distributed crack in the 1100 block of Green Street in Philadelphia.

Overt Acts

1. On or about March 9, 2002, defendant ARNOLD WILLIAMS possessed with intent to distribute approximately 130 grams of crack in his Ford Taurus.

2. On or about March 9, 2002, defendant MUSTAFA FRISBY sold crack for defendant ARNOLD WILLIAMS in the 1100 block of Green Street in Philadelphia.

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 9, 2002, at Philadelphia, in the Eastern District of
Pennsylvania, defendants

ARNOLD WILLIAMS and
MUSTAFA FRISBY

did knowingly and intentionally possess with intent to distribute, and aided and abetted the
possession with intent to distribute, in excess of 50 grams, that is, approximately 130 grams, of a
mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II
controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 9, 2002, at Philadelphia, in the Eastern District of Pennsylvania, defendant

ARNOLD WILLIAMS

knowingly carried a firearm, that is, a Hi-Point .380 caliber, model CF, serial number obliterated, which was loaded with six live rounds, during and in relation to drug trafficking crimes for which he may be prosecuted in a court of the United States, that is, conspiracy to possess cocaine base (“crack”) with intent to distribute and possession with intent to distribute crack, in violation of Title 21, United States Code, Sections 846 and 841(a)(1), (b)(1)(A), as charged in Counts One and Two of this Indictment.

In violation of Title 18, United State Code, Section 924(c)(1).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 9, 2002, at Philadelphia, in the Eastern District of
Pennsylvania, defendant

ARNOLD WILLIAMS

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce, a firearm, that is, a Hi-Point .380 caliber, model CF, serial number obliterated, which was loaded with six live rounds.

In violation of Title 18, United States Code, Section 922(g)(1).

NOTICE OF PRIOR CONVICTION

Defendant ARNOLD WILLIAMS committed the offenses charged in Counts One and Two of this Indictment after having been convicted in a court of the Commonwealth of Pennsylvania of a felony drug offense, that is, possession with intent to deliver a controlled substance, C.P. Phila. Cty. 9411-1098.

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney